



**PATRICK D. CROCKER**  
[patrick@crockerlawfirm.com](mailto:patrick@crockerlawfirm.com)

March 1, 2019

Ms. Marlene H. Dortch, Commission Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

*Filed Electronically Via ECFS*

RE: CMC Telecom & Internet, Inc.  
NRC Runoff, LLC  
Customer Proprietary Network Information Certification  
EB Docket No. 06-36

Dear Ms. Dortch:

CMC Telecom & Internet, Inc. and NRC Runoff, LLC, by its undersigned attorneys, hereby submits its 2018 CPNI Compliance Certificate and Accompanying Statement certifying compliance with Section 64.2001 *et seq.* of the Commission's rules.

Please contact the undersigned should you have any questions or concerns at (269) 381-8893 extension 226 or [patrick@crockerlawfirm.com](mailto:patrick@crockerlawfirm.com).

Very truly yours,

CROCKER & CROCKER

A handwritten signature in purple ink, appearing to be 'PDC', written over a light blue circular stamp.

Patrick D. Crocker

PDC/tlb

Enclosures

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year 2018

Date filed: March 1, 2019

Name of Companies Covered by this Certification:

CMC Telecom & Internet, Inc.  
NRC Runoff, LLC

Form 499 Filer ID: 824022

Name of Signatory: Krista Crocker

Title of Signatory: President

I, Krista Crocker, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

This Certification is dated this 1<sup>st</sup> day of March, 2019.

Krista Crocker  
President



## Customer Proprietary Network Information Certification Attachment A

CMC Telecom & Internet, Inc. and NRC Runoff, LLC (hereinafter collectively, “the Companies”) have established practices and procedures adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, (“Section 222”) and the Federal Communications Commission's (“FCC”) rules pertaining to customer proprietary network information (“CPNI”) set forth in sections 64.2001 – 64.2011 of the Commission's rules. This attachment summarizes those practices and procedures, which have been updated so that they are adequate to ensure compliance with the Commission's CPNI rules.

The Companies provides private line services to large enterprise and carrier customers pursuant to ICB contracts. The Companies’ customer contracts uniformly contain confidentiality agreements addressing customers' private information. The Companies will not disclose CPNI except as where required by law.

### Safeguarding against pretexting

- The Companies takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, including the authentication of customers prior to disclosing CPNI based on customer-initiated contacts. The Companies is committed to notifying the FCC of any novel or new methods of pretexting it discovers and of any actions it takes against pretexters and data brokers.

### Training and discipline

- The Companies has established a supervisory review process designed to ensure compliance with the FCC's CPNI rules. In the event The Companies gains access to CPNI, The Companies will train personnel as to when they are and are not authorized to use CPNI. The Companies personnel failing to follow policies and procedures established by The Companies protecting CPNI will be subject to a disciplinary process. The Companies prohibits employees from using customer information other than for providing service to the customer or as required to be disclosed by law.

### The Companies use of CPNI

- Should The Companies gain access to CPNI, The Companies shall use such information only as authorized and required by law.
- The Companies will not distribute such CPNI to third parties for their sales or marketing purposes nor will The Companies share, sell, lease or otherwise provide CPNI to any of its affiliates, suppliers, vendors, or any other third party for the purpose of marketing any service.

- The Companies does not share, sell, lease or otherwise provide CPNI to any third party. In the event The Companies gains access to CPNI, The Companies will not otherwise disclose CPNI to a third party except when required by a lawfully issued government subpoena.

#### Additional safeguards

- The Companies will not use CPNI for marketing purposes and therefore does not have records to maintain regarding marketing campaigns using CPNI.
- The Companies designates one or more officers, as an agent or agents of the The Companies, to sign and file a CPNI compliance certificate on an annual basis. The certificate conforms to the requirements set forth in FCC rule 64.2009(e).
- The Companies does not disclose CPNI over the phone and does not allow for online access to CPNI.
- In the event of a breach of CPNI, The Companies will comply with all applicable breach notification laws.